

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

Petitioner/Plaintiff,
Vs. _____ NO. _____
Respondent/Defendant

INTERROGATORIES TO DEFENDANT (FIRST SET)

COMES NOW, the plaintiffs in the above-styled cause and, desiring the testimony of the Defendant _____, propounds interrogatories pursuant to _____. You are under a duty to seasonably amend a prior response if you obtain information upon the basis of which you know that the response, through correct when made, is no longer true, and the circumstances are such that a failure to amend the response is, in substance, a knowing concealment.

INTERROGATORIES

COMES NOW, the plaintiffs in the above-styled cause and desiring the testimony of the defendants, propounds the following interrogatories pursuant to _____.

1. State your complete name, addresses at the time of the incident made the basis of this action and as of the date of your answers to these interrogatories. Additionally, please provide your driver's license number and your social security number.

2. State the name and address of the owner of the motor vehicle driven by you on the date of the incident made the basis of this suit.

3. Were you performing an errand, mission or duty for anyone whatsoever? If so, state the nature of the same and the name and address of the person for whom you were performing it.

4. Give the name and address of each and every person or firm who had any interest whatsoever in the trip that was being made by you at the time of the accident, and state the nature of said interest and connection of said person or entity with the trip.

5. Describe in detail any drugs or medication you were taking on the day of the accident, the name and address of the health care provider prescribing the same, and the name and address of the pharmacy where you obtained the same.

6. State in detail where the vehicle occupied by plaintiffs was located when you first observed it prior to said accident and describe what you observed.

7. How many feet was the vehicle occupied by plaintiffs from the place of impact when you first observed said vehicle and how many feet were you from that point of impact when you first observed them?

8. Describe your driving history prior the accident made the basis of this suit, i.e., tickets (other than parking), accidents, DUI's, etc., for a seven-year period.

9. State specifically and in chronological detail exactly how the accident made the basis of this suit occurred and describe chronologically the events which occurred leading up to the same as seen by you, including the speed and direction you were traveling when you first saw plaintiffs' vehicle, including all changes in speed and direction made by you until your vehicle came to rest. Include in your answer the basis for your answers.

10. State whether or not any of the occupants in any of the vehicles involved in the accident made the basis of this suit, including yourself, were intoxicated, drinking intoxicating beverages, or had been drinking intoxicating beverages 24 hours prior to the accident.

- (a) If your answer to the above question is in the affirmative, give the name and address of each person who was drinking or had been drinking or who was intoxicated.
- (b) State what each said person was drinking, where he or she had obtained the same, the quantity or amount consumed, and the time and place where the same was consumed.

11. Describe in detail your activities for the 24-hour period immediately preceding the accident made the basis of this suit, including in your answer where you were coming from, where you were going to, the time you departed, and your expected time of arrival at the time of the accident made the basis of this suit.

12. State, according to your best judgment, the speed of the vehicle in which you were traveling at the following points: when you first saw the vehicle occupied by plaintiffs; when you first applied your brakes; and at the time of impact. Include in your answer the basis for your answers.

13. State whether or not the brakes on the vehicle occupied by you or owned by you at the time of the accident made the basis of this suit were applied prior to collision. If so, state in your best judgment the location on _____ road when the brakes were applied and the distance in number of feet said vehicle traveled from the moment the brakes were applied until collision occurred. Include in your answer the basis for your answers.

14. State whether or not there were any other vehicles at or near the scene of the accident at the time of and immediately prior to the occurrence of same. If so, state the number of such other vehicles and where they were located with reference to the point of the accident at the moment same occurred.

- (a) Describe in detail whether or not any of the other vehicles, objects or persons located at or near the scene of the accident played any part or contributed in any manner to cause the collision made the basis of this suit. Describe the basis for your answer.

15. With respect to each statement, remark, comment or communication made by anyone (including you), concerning the incident made the basis of this suit, please state:

- (a) The name, last know address, and last known telephone number of **each** person making the statement, etc.;
- (b) The substance of **each** statement, etc., made;
- (c) The name, last known address, and last known telephone number of **each** person to whom the statement, etc., was made, and/or who heard the same and/or who was present when the statement, etc., was made, including in your answers any responses thereto.

16. State the name, last known address, and last known telephone number of each person who:

- (a) Was a witness concerning the incident made the basis of this suit;
- (b) You, your attorney, your insurance company, or someone acting on your behalf has talked to concerning any matter involving the case made the basis of this suit;
- (c) Has discoverable information concerning that incident made the basis of this suit; and
- (d) From whom you, your attorney, your insurance company or anyone acting on your behalf has taken a statement from, in any form, whatsoever.

17. State the name of the insurance carrier for _____ vehicle, and the amount of liability coverage per occurrence and aggregate.

18. Identify each person whom you expect to call as an expert witness at the trial of this case; state the subject matter on which the expert is expected to testify; the substance of the facts and opinions to which the expert is expected to testify; the summary of the grounds for each such opinion and the qualifications of each such expert or experts.

19. If you contend you are not liable to the plaintiffs for the incident made the basis of this suit, *for any reason whatsoever*, please state:

- (a) Each and every contention or reason why you are not liable to plaintiffs;
- (b) Each and every fact and/or the basis for each contention or reason why you are not liable.
- (c) state the name, last known address and last known telephone number of each and every witness, expert or otherwise, to correspond with each and every contention or reason why you allege you are not liable to the plaintiffs for the incident made the basis of this suit;
- (d) Identify each and every document and/or tangible items specifically identifying the corresponding reason or contention why you are not liable to plaintiffs sufficiently enough to allow the plaintiffs to obtain the same by a request for production.

Respectfully submitted,

Dated: _____

Name:
Title:
Address:
Address:
City, State, Zip:
Phone:

Fax:
E-Mail:
Attorney No.:

CERTIFICATE OF SERVICE

I, _____, do hereby certify that I have this day mailed,
U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing to
_____, at the following address;

THIS the ____ day of _____, 20____.

PLEASE SERVE INTERROGATORIES WITH THE COMPLAINT